

SEMI-ANNUAL COMPLIANCE STATUS REPORT

Prepared for:

**United States Department of Justice
Washington, D.C.**

**U.S. Environmental Protection Agency - Region 6
Dallas, Texas**

**U.S. Environmental Protection Agency – Region 7
Kansas City, KS**

Prepared by:

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September 20, 2012

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1.0 Introduction

1.1 Report Purpose

This Semi-Annual Compliance Status Report has been prepared in compliance with Provision VI (Reporting Requirements) of the Consent Decree between the United States Environmental Protection Agency (EPA) and Plains All American Pipeline et al. al. (Plains) having an Effective Date of September 20, 2010. This provision of the Consent Decree requires that a semi-annual report be submitted to the United States Department of Justice and EPA Regions 6 and 7 summarizing the status of Plains' efforts towards compliance with Section V (Compliance Requirements) of the Consent Decree as well as the other specific reporting requirements of Section VI. This report covers the reporting period of March 1, 2012 to August 31, 2012.

1.2 Report Organization

The Semi-Annual Compliance Status Report sections are generally organized to follow the requirements of Section V (Compliance Requirements) of the Consent Decree. The reporting requirements of Section VI are addressed as specified by the Consent Decree within these report sections. For the purposes of this report, the capitalized term "Pipeline or Pipelines" has the definition presented in Sub-Paragraph III.9.Q. of the Consent Decree.

1.3 Period Covered by This Report

The Consent Decree requires that a semi-annual report be provided to EPA by no later than six months after the Effective Date of the Consent Decree and every six months thereafter until the Consent Decree terminates. Under that requirement, the time period to be covered by the first semi-annual report would have been the six month period preceding the date of the report. This presented a logistical problem in ensuring that the semi-annual compliance status report provided data and certifications that covered the reporting period specified without missing the reporting deadline. The timing specified in the Consent Decree required that the end of the reporting period match the semi-annual report deadline, which left no time to compile the required reporting data or prepare the report.

This issue was the subject of a telephone call with EPA Region 6 on February 24, 2011. During that call, it was agreed that the period covered by the first Semi-Annual Compliance Status Report would be from the Effective Date of the Consent Decree (September 20, 2010) until the end of the month preceding the reporting deadline. This agreement was documented in a follow-up e-mail from Nelson Smith (EPA, Region 6). Based on this agreement, this Semi-Annual Compliance Status Report covers the period from March 1, 2012 to August 31, 2012.

1.4 Total Miles of Pipeline Purchased, Acquired, or Sold

During the reporting period covered by this Semi-Annual Compliance Status Report, and in accordance with Consent Decree Section VI, Sub-Paragraph 20.A., Item viii, Plains notifies the EPA that it did not purchase or acquire any Pipeline segments.

1.5 Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Mark J. Gorman, Senior Vice President



Date

2.0 Consent Decree Compliance Status (*Consent Decree Section V*)

The following sections present a summary of the status of compliance with each of the Provisions of Section V of the Consent Decree (CD) as of August 31, 2012.

2.1 Enhanced Integrity Management and Corrosion Control

2.1.1 IMP Requirements for Category I, II-B and III-B Pipelines (CD Sub-Paragraph 15.A.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category I, Category II-B and Category III-B Pipelines in accordance with the requirements of Plains' Integrity Management Plan (IMP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

2.1.2 RSP Screening of Category II-A, III-A and IV Pipelines (CD Sub-Paragraph 15.B.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category II-A, Category III-A and Category IV Pipelines in accordance with the requirements of Plains' Risk Screening Program (RSP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has developed and implemented Action Plans detailing risk mitigation actions to address the risks or other anomalies found during the RSP in accordance with the Risk Category Schedule in the RSP.

Plains maintains a database that tracks all pipeline segments subject to the RSP screening, their risk levels, the development of Action Plans and Elements and the implementation of the individual Action Elements. The Consent Decree requires that Plains report progress regarding the completion of any required milestones, including "...summaries of the RSP Action Plans required pursuant to sub-paragraph 15.B. and a

description of actions taken pursuant to the RSP Action Plans during the preceding six months."

In this report, Plains provides summary tables that present a snapshot of the progress towards completion of Action Plans and Action Plan Elements developed under the RSP during the reporting period covered by this report. The first table (**Attachment A-1**) illustrates Plains' progress towards the creation and approval of Action Plans emanating from the risk screening process. It is a report card that Plains uses to measure progress towards completion of required Action Plans based upon the initial risk screening and risk level assignment. This report card shows the number of Action Plans due to be completed during the reporting period (based upon the initial screening date and the risk level assignment, or subsequent reviews), the number completed, those instances where remedial measures were implemented in the event an Action Plan was not developed or approved within the program time limits, and the percent created and approved of the total due to be completed and approved. If the program is operating properly, this report card should show 100% completed and approved for each of the Districts for that reporting period.

A second summary table (**Attachment A-2**) is a listing of Action Plan Elements and the progress towards their completion. This table lists each Action Plan Element by its unique tracking number, the district, the pipeline segment name, risk level, the Action Plan Element Category, the status of the Action Plan Element, and the proposed and actual completion dates. As this is a dynamic process, the table presents only those action plan elements that are scheduled to be completed within the current semi-annual reporting period. As with the previous table, if the program is operating properly, at the end of each semi-annual reporting period, all of the Action Plan Elements due to be completed during that reporting period should have "CPL" (complete) noted under the status column.

2.1.3 Integrity Management of Category II and III Pipelines (CD Sub-Paragraph 15.C.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has operated and maintained all Category II-A and Category III-A (Gathering) Pipelines in conformity with the safety requirements for rural gathering pipelines established in 49 CFR 195.11(b).

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.i.a. and b., Plains has:

- identified all Category II-A and III-A (Gathering) Pipeline Segments; and
- developed and implemented a continuing education program in conformity with 40 CFR 195.444.

As of July 3, 2010, Plains developed and implemented a corrosion control program in conformance with 49 CFR 195, Subpart H, in accordance with V.15.C.i.c.

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.ii.a., Plains has identified all Category II-B and III-B (Low Stress) Pipeline Segments. A listing of the Category II-B and III-B Pipeline segments is provided in the summary table included in Attachment C to the report.

In accordance with V.15.C.ii.b., Plains has completed baseline assessments required under Consent Decree provision V.15.C.ii.b. based on the total mileage of Category II-B and III-B Pipeline. As discussed in the previous semi-annual compliance status report dated March 15, 2011, baseline assessments were completed on 72.6% of the Category II-B and III-B Pipeline operated by Plains as of January 3, 2011. This complied with the Consent Decree requirement that baseline assessments be completed at least 50% of the Category II-B and III-B Pipelines by January 3, 2011.

In the previous Semi Annual Compliance Status Report dated March 20, 2012, Attachment C (Summary of Baseline Assessment Status Through February 29, 2012 for Class II-B and Class III-B Pipeline Segments) provides a summary table listing the Pipeline segments covered by this provision of the Consent Decree and the status of baseline assessments for those segments through February 29, 2012. As of February 29, 2012, baseline assessments had been completed on 100% of the Category II-B and III-B Pipeline segments operated by Plains as of the Effective Date of the Consent Decree (September 20, 2010), and has therefore complied with Sub-Paragraph V.15.C.ii.b. of the Consent Decree well in advance of the July 3, 2013 deadline.

2.1.4 New Pipeline Acquisitions (CD Sub-Paragraph 15.D.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains did not acquire or sell any segments of Pipeline.

Please note that in the table listing the newly acquired pipelines included in the previous semi-annual compliance status report (Attachment A-1), a number of newly acquired Category IV pipelines were characterized as "Proposed". This meant that these particular pipeline segments were part of a larger system acquisition and had not yet been built as of the date Plains acquired the larger system. Since the segments were proposed and not yet built at the time of acquisition, they are not "Pipelines" under the Consent Decree definition.

Also, in this same table are listed a pipeline segment that is characterized as "Inactive" (Route ID No. 12878) and another that is characterized as "Retired" (Route ID No. 12892). Both of these pipelines had been emptied and purged by their previous owners prior to their acquisition by Plains. As a result, neither segment is a "Pipeline" under the Consent Decree definition unless and until they are placed back into crude oil service.

The previous semi-annual compliance status report dated March 20, 2012 covering the previous reporting period (September 1, 2011 to February 29, 2012) reported that newly acquired Category III-A and IV

Pipeline segments acquired on September 8, 2011, November 1, 2011 and February 1, 2012 were to be screened under Plains' RSP within 12 months of their acquisition date. The RSP status reports for these Pipeline segments are provided in **Attachment B**.

No new Category II-A, Category III-A or IV Pipeline segments were acquired during the reporting period covered by this report, so with the submission of the risk screening reports provided in **Attachment B** to this report, risk screening of all Category II-A, Category III-A and Category IV Pipeline segments acquired during the effective period of the Consent Decree to date have been risk screened in accordance with the Plains RSP and Subchapter V.15.D.i. of the Consent Decree.

**2.1.5 Geographic information Systems (GIS) Mapping
(CD Sub-Paragraph 15.E.)**

Plains completed initial digital mapping and Centerline Verification of all Pipelines operated by Plains as of May 1, 2010. Initial digital mapping and Centerline Verification of these Pipelines was completed by July 1, 2010.

**2.1.6 Anode Beds, Internal Corrosion Control and Close Interval
Surveys (CD Sub-Paragraph 15.F.)**

In the previous Semi-Annual Compliance Status Report, it was concluded that Plains had completed all of the requirements of Consent Decree Sub-Paragraph V.15.F. During an internal Plains audit evaluating Consent Decree compliance conducted in April and May 2012, it was discovered that the number of anode bed replacements presented in Attachment E to the Semi-Annual Compliance Status reports dated March 20, 2011 and September 20, 2011 were incorrect. This issue is discussed in more detail in Sections 3.1 (Problems Identified During the Reporting Period) and 3.2 (Implemented or Planned Solutions to Problems Identified During the Reporting Period) of this report.

As discussed in Sections 3.1 and 3.2 of this report, the reporting errors identified in Plains internal audit did not result in a violation of the Consent Decree requirements in Sub-Paragraph 15.F. The corrected

tables discussed in Section 3.2 of this report confirms that Plains has complied with the requirements of Sub-Paragraph 15.F. well within the deadline specified in the Consent Decree.

**2.1.7 Subsequent Revisions to Plains' IMP or RSP
(CD Sub-Paragraph 15.G.)**

No material changes to Plains' IMP or RSP have been made during the reporting period.

**2.2 Enhanced Pipeline Leak Detection
(Consent Decree Paragraph 16)**

**2.2.1 Weekly Aerial Patrols
(CD Sub-Paragraph 16.A.)**

All active Category I, II-A, II-B, and III-B Pipelines (including all Category I, II-A, II-B and III-B Pipeline acquired since the September 20, 2010) and those active Pipelines listed in Appendix A of the Consent Decree have been the subject of a weekly aerial, motor vehicle or foot patrol (weather permitting) in accordance with the requirements of Sub-Paragraph 16.A. of the Consent Decree.

**2.2.2 Implementation of API 1130 Compliant CPM Detection
(CD Sub-Paragraph 16.B.)**

All active (in service) Pipeline segments listed in Appendix B of the Consent Decree complied with the performance standards for Computational Pipeline Monitoring (CPM) Leak Detection set forth in API RP 1130 at the end of the March 1, 2011 to August 31, 2011 reporting period and as presented in the September 19, 2011 Semi-Annual Compliance Status Report. In addition, during that reporting period, Plains identified 30 additional Pipeline segments for installation of CPM equipment as required by Sub-Paragraph V.16.C.1 of the Consent Decree. As of the end of the March 1, 2011 to August 31, 2011 reporting period and as presented in the September 19, 2011 Semi-Annual Compliance Status Report, all of these 30 additional pipeline segments complied with the performance standards for Computational Pipeline Monitoring (CPM)

Leak Detection set forth in API RP 1130. This was well in advance of the December 31, 2011 deadline stipulated by Sub-Paragraph V.16.C.1 of the Consent Decree.

2.2.3 Enhancement of API 1130 Compliant CPM Leak Detection and Minimization of Slack-Line Operations (CD Sub-Paragraph 16.C.)

The Consent Decree requires that an investigation of specific Pipeline Segments listed in Appendix B of the Consent Decree (as well as any Segments added to the Computation Pipeline Monitoring pursuant to Sub-Paragraph 16.B.) be the subject of an investigation that is designed to identify potential enhancements to Plains' leak detection capabilities and measures to minimize Slack-Line Operations or mitigate the effects of Slack-Line Operations on the CPM leak detection systems on those Pipeline Segments.

It also requires that Action Plans be developed based upon the findings of the investigations described above, which will include one or more of the measures identified in 16.C.i.b.5. and any other actions Plains may take to improve the leak detection system and/or minimize Slack-Line Operations.

The following sections summarize Plains' activities conducted in compliance with these requirements.

2.2.3.1 Investigation

Plains has completed the investigations specified in Sub-Paragraph V.16.C.i. evaluating the extent of Slack-Line Operations for all active (in service) Pipeline segments listed in Appendix B of the Consent Decree. Plains has also migrated each of these segments to the Telvent Oasis DNA Pipeline Monitoring (PLM) CPM application used in Plains' Midland, TX Operational Control Center in accordance with Sub-Paragraph V.16.C.i.a.

A table summarizing the current CPM compliance status of each of these segments along with the findings from the investigation of each segment is presented in **Attachment C-1**.

In addition, Plains has identified 30 additional pipeline segments as required by Sub-Paragraph V.16.B. of the Consent Decree. Plains completed the evaluation of the extent of Slack-Line Operations for these additional pipeline segments in accordance with Sub-Paragraph V.16.C.i.b. during the previous reporting period. Plains also migrated each of these segments to the Telvent Oasis DNA Pipeline Monitoring (PLM) CPM application used in Plains' Midland, TX Operational Control Center in accordance with Sub-Paragraph V.16.C.i.a.

A table summarizing the current CPM compliance status of each of these segments along with the findings from the investigation of each segment is presented in **Attachment C-2**.

2.2.3.2 Action Plans

Plains has developed or is developing Action Plans based upon the findings of the investigations discussed in the previous section in accordance with Sub-Paragraph V.16.C. of the Consent Decree. Of the 110 Pipeline segment investigations conducted to-date (80 segments from Appendix B and 30 additional segments identified by Plains), a total of 26 concluded that no actions need be taken. The remaining 84 Pipeline segment investigations concluded that an Action Plan needed to be developed and implemented. As of the reporting deadline for this report (August 31, 2012), 66 Action Plans were developed and have been completed, 18 Action Plans were developed and their implementation is in progress. As of the March 31, 2012 deadline stipulated by the Consent Decree all of the Action Plans required pursuant to Sub-paragraph V.15.C.ii of the Consent Decree have been developed and have either been completed or are being implemented. A summary of the development and implementation status of these Action Plans as well as their completion dates is also included in the summary table presented in **Attachments C-1** (for the Appendix B Pipeline

segments) and C-2 (for the additional 30 Pipeline segments).

2.3 Requirements for Replacement and/or Substitute Breakout Tanks (Consent Decree Paragraph 17)

Plains complies with the requirements of this paragraph of the Consent Decree through its Management of Change (MOC) process. A Management of Change (MOC) form is required for any activity requiring the use of a substitute or breakout tank. If a substitute or breakout tank is required, an evaluation of the substitute or breakout tank storage volume adequacy and an evaluation of the adequacy of the secondary containment must be reviewed and verified by those Plains personnel approving the MOC form.

2.4 Personnel and Training (Consent Decree Paragraph 18)

2.4.1 Position Preservation (CD Sub-Paragraph 18.A.)

During the reporting period covered by this semi-annual report, Plains has staffed and preserved the positions listed in Sub-Paragraph V.18.A of the Consent Decree.

2.4.2 Employee Training (CD Sub-Paragraph 18.C. and 18.D.)

During the reporting period covered by this semi-annual report, all personnel assigned to operate and maintain Category III-A and IV Pipelines have been trained or maintained their training in conformity with the Operator Qualification requirements of 40 CFR 195.

During the reporting period covered by this semi-annual report, sixty-three (63) new pipeline controller applicants were pre-screened using a computer simulator-based console operator assessment (Cobra).

As of December 31, 2010 Plains has trained field personnel performing Pipeline maintenance in proper Pipeline cleaning techniques and

procedures. As new employees are hired this training is included in their on-going training.

2.5 Permits (Consent Decree Paragraph 19)

No federal, state or local permit or approval was required to fulfill any compliance obligation in Section V of the Consent Decree during the reporting period of this report that would require, or have the potential to require Plains to seek relief under the provisions of Section VIII (Force Majeure) of the Consent Decree.

3.0 Compliance Problems During the Reporting Period

3.1 Problems Identified During the Reporting Period

Problem #1 - Anode Bed Replacement

During an internal Plains audit evaluating Consent Decree compliance conducted in April and May 2012, it was discovered that the number of anode bed replacements presented in Attachment E to the Semi-Annual Compliance Status reports dated March 20, 2011 and September 20, 2011 were incorrect. Specifically, it was determined that anode bed replacements on pipelines not covered by the Consent Decree (natural gas, propane and refined product pipelines) had been included in the counts provided in these reports.

Problem #2 - Pipeline Re-Assessment Oversight

Pipeline Segment Name:	Valero Connection, Line 031 LAR Connection to Terminal 2
Pipeline Segment Length:	175 feet
District:	Long Beach
Consent Decree Categorization:	Class I

This pipeline segment is a short (175-foot) connecting pipeline between the L048 Line 31 LAR Connection to Terminal 2 Mainline and the Valero Tank Farm in Los Angeles, CA. The L048 Line 031 LAR Connection to Terminal 2 (including the Valero Connection) was identified as Class I during the initial categorization of all pipeline segments in accordance with the Consent Decree in 2006. At the time of categorization, this segment had been subject to a hydrostatic test in 2005 and was due for reassessment by no later than May 2011.

In preparation for the re-assessment of this pipeline, improvements were made to the mainline to allow it to be assessed using in-line inspection (ILI) methods. ILI assessment was completed in early 2011 in accordance with Plains' IMP.

During an internal review of assessment records in May 2012, it was discovered that of the 20,365 feet that was assessed in 2005, the 175-foot section had not been included in the ILI assessment conducted in early 2011. The shortness of this connection and the limitations of the right of way had made it impractical to include it in the ILI assessment effort.

After discovery of this oversight, the Plains Pipeline Integrity Group evaluated several options for re-assessing the Valero Connection, settling on hydrotesting since it could be used to assess the current threats, could be completed quickly and would not require modifications to the pipeline to accomplish as would ILI.

The valve locations on L048 Line 31 LAR Connection to Terminal 2 and the Valero Connection make it impossible to isolate the Valero Connection from a portion of the L048 Line 31 LAR Connection to Terminal 2 pipeline. As a result, hydrotesting of the Valero Connection required shutting down and hydrotesting a portion of the L048 Line 31 LAR Connection to Terminal 2 pipeline concurrent with the Valero Connection. This took some time to coordinate, but was completed in July 2012; bringing the Valero Connection portion of the L048 Line 031 LAR Connection to Terminal 2 pipeline into compliance with Plains' IMP and Sub-Paragraph V.15.A. of the Consent Decree.

3.2 Implemented or Planned Solutions to Problems Identified During the Reporting Period

Problem #1 - Anode Bed Replacement

Included in Attachment D to this report are revised tables reflecting the corrected anode bed replacement counts (and associated costs) based upon a thorough review of anode bed replacement records for 2010 and 2011. These counts include only those pipelines covered by the Consent Decree. A revised table has been provided in **Attachment D** for each of the two Semi-Annual reports that were in error:

- March 20, 2011 covering the reporting period of September 20, 2010 to February 28, 2011 and the remainder of 2010 for the purposes of this requirement of the Consent Decree; and
- September 20, 2011 covering the reporting period of March 1, 2011 to August 16, 2011.

A third table has been provided in **Attachment D** that covers the remainder of 2011 (August 17, 2011 through December 31, 2011).

The Consent Decree goal of 120 Anode Bed installations/replacements must be completed in calendar years 2010 and 2011. The tables included in this report reflect a total number of anode beds installed or replaced in calendar years 2010

and 2011 of 160. This is well in excess of the Consent Decree requirement of 120.

Although the anode bed installation/replacement tables contained in Attachment E to the March 20, 2011 and September 20, 2011 reports were in error, Plains was never out of compliance with the Consent Decree (Subparagraph V.15.F.).

Problem #2 - Pipeline Re-Assessment Oversight

The Valero Connection portion of the L048 Line 031 LAR Connection to Terminal 2 pipeline has been called out as a separate pipeline segment in the database Plains uses to monitor pipeline assessment status in accordance with the Plains IMP. It has been noted that though the L048 Line 031 LAR Connection to Terminal 2 pipeline can be assessed using ILLI, the Valero Connection (and a portion of the L048 Line 031 Connection to Terminal 2 pipeline) must be assessed through hydrotesting.

4.0 Consent Decree Violations or Force Majeure Events

During the reporting period covered by this Semi-Annual Compliance Status Report, no Consent Decree violations or Force Majeure Events occurred.

ATTACHMENT A-1

**Status of Action Plan Development and Implementation under
the Risk Management Program (RMP)**

**Risk Screening Program Action Plan Creation
Report Card**

RSP District Report Card
Reporting Period: 03/01/2012 - 08/31/2012

<i>(Plan Preparation & Approval)</i>						
ACTION PLAN CREATION - Number of Action Plans to create & approve for this Reporting Period						
District	Due for Creation	Approved on Time	AP's With Due Dates Between Today and 08/31/12	Remedial Action Taken or Approved within 30 Days	% Created & Approved w/ in Program Guidelines	Comments
Abbeville	2	2	0	0	100%	
Bakersfield	11	11	0	0	100%	
Belfield	36	35	0	1	100%	AP's approved during remedial measures development period (30 days)
Casper	8	8	0	0	100%	
Colorado City	16	16	0	0	100%	
Corpus Christi	2	2	0	0	100%	
Cushing	18	18	0	0	100%	
Cushing Terminal	0	0	0	0	100%	
East Cst Terminal	0	0	0	0	100%	
Evanston	18	18	0	0	100%	
Heidelberg	14	14	0	0	100%	
Kilgore	0	0	0	0	100%	
Long Beach	0	0	0	0	100%	
Midland Basin	0	0	0	0	100%	
Permian E	14	11	0	3	100%	AP's approved during remedial measures development period (30 days)
Permian N	17	17	0	0	100%	
Permian S	16	14	0	2	100%	AP's approved during remedial measures development period (30 days)
Russell	32	24	0	8	100%	AP's approved during remedial measures development period (30 days)
Wichita Falls	0	0	0	0	100%	
Totals	204	190	0	14	100%	

ATTACHMENT A-2

**Status of Action Plan Development and Implementation under
the Risk Management Program (RMP)
Action Plan Element Implementation Status**

APE's Completed 3/1/2012 thru 8/31/2012
Displaying records 1 - 113

Number of records 113

Action Plan Element	District Name	Pipeline Segment Name	Risk Level	AP Element Category	AP Status	Actual Completion Date
14178	Cushing	Alma Corner Jct to Tussy	IV	Idle Isolate Purge	CPL	3/9/2012
14179	Permian E	CW Merchant	III	Evaluate & Enhance ROW & Markers	CPL	4/30/2012
14181	Colorado City	East Ackerly Dean 187 to Chevron Tract 74 (w/ Dean Unit 168 & Chevron 74)	III	Other	CPL	3/21/2012
1646	Permian E	Spraberry to Greenwood	III	Rehab or Replace Pipe	CPL	5/26/2012
1658	Permian E	Sulfur Draw to Ken Cox 6"	IV	Rehab or Replace Pipe	CPL	6/5/2012
22356	Permian N	State of NM Nct. 1 6in Steel (WTI)	III	Other	CPL	3/30/2012
22357	Corpus Christi	George West	III	Conduct ILI	CPL	5/21/2012
2415	Russell	Pratt to Pleasant Ridge	III	Conduct ILI	CPL	6/21/2012
24405	Permian E	Douglas to Patterson	I	Conduct ILI	CPL	4/23/2012
24406	Permian E	Douglas to Patterson	I	Evaluate & Enhance Cleaning Pig Program	CPL	4/30/2012
24408	Permian E	Douglas to Patterson	I	Conduct ILI	CPL	3/29/2012
24409	Permian E	Tract 1 Launcher to Douglas	IV	Idle Isolate Purge	CPL	3/27/2012
24411	Permian E	Woody E	IV	Idle Isolate Purge	CPL	4/20/2012
24412	Permian E	Waddell 542 (w/ PJL 168)	IV	Idle Isolate Purge	CPL	4/11/2012
2642	Russell	Colby to Sharon	III	Conduct ILI	CPL	6/28/2012
2881	Russell	Patterson to Wolf Mainline	III	Rehab or Replace Pipe	CPL	5/11/2012
2883	Russell	Sooby to Wolf	III	Conduct ILI	CPL	6/19/2012
2885	Russell	Wolf to Eubanks (w/ Laterals)	III	Conduct ILI	CPL	6/20/2012
3015	Permian N	Mallet 64	III	Conduct Hydro	CPL	6/22/2012
3322	Russell	Laverne to Stockholm	III	Rehab or Replace Pipe	CPL	3/7/2012
33987	Permian E	Bigby 6" ML	IV	Idle Isolate Purge	CPL	6/28/2012
33988	Permian E	Bigby Whitehouse to Sohio Pump	IV	Idle Isolate Purge	CPL	6/25/2012
33989	Permian E	SDU 77, 78, 80 Lateral	IV	Idle Isolate Purge	CPL	6/21/2012
33990	Permian E	Bigby Whitehouse - Sohio Pump Lateral	IV	Idle Isolate Purge	CPL	6/23/2012
33991	Permian E	SDU 110, 110-A, 110-B, 138-A	IV	Idle Isolate Purge	CPL	6/21/2012
33992	Permian E	Bigby 197A - Whitehouse	IV	Idle Isolate Purge	CPL	6/20/2012
33993	Permian E	SDU 132 & 133 - Whitehouse	IV	Idle Isolate Purge	CPL	6/22/2012

33994	Permian E	SDU 156 & 157-A	IV	Idle Isolate Purge	CPL	6/21/2012
33995	Belfield	Fryburg to Hwy 10	III	Conduct ILI	CPL	7/27/2012
33997	Belfield	Hwy 10 to Dickinson	III	Conduct ILI	CPL	7/27/2012
33999	Belfield	Dickinson to Dodge	II	Conduct ILI	CPL	7/10/2012
34001	Cushing	E Velma Sims to ML Tie In	III	Idle Isolate Purge	CPL	3/9/2012
34002	Cushing	N Alma Penn Unit to ML Tie In	III	Idle Isolate Purge	CPL	3/9/2012
34019	Heidelberg	Laurel 6"	IV	Idle Isolate Purge	CPL	3/19/2012
34020	Heidelberg	Laurel Tie-in to Eucutta 8"	IV	Idle Isolate Purge	CPL	4/19/2012
34021	Russell	Leiker Suction	IV	Idle Isolate Purge	CPL	6/1/2012
34022	Russell	Agatha	IV	Idle Isolate Purge	CPL	6/1/2012
34023	Russell	Leiker Discharge	IV	Idle Isolate Purge	CPL	6/1/2012
34024	Russell	Lulu	IV	Idle Isolate Purge	CPL	6/1/2012
34031	Russell	Miller Suction	III	Idle Isolate Purge	CPL	8/1/2012
34032	Russell	Ulrich Witt Discharge (w/ Poly Suction)	III	Idle Isolate Purge	CPL	8/1/2012
34044	Russell	Huber Suction (Poly)	III	Rehab or Replace Pipe	CPL	8/1/2012
34067	Permian S	North 4" Sweet	IV	Idle Isolate Purge	CPL	4/4/2012
34068	Permian S	Bass Walton "A"	IV	Idle Isolate Purge	CPL	4/4/2012
34069	Permian S	JL Johnson B Mtr 44	IV	Idle Isolate Purge	CPL	4/4/2012
34101	Permian N	Vacuum Tie In to Lea Stn	I	Other	CPL	5/14/2012
34102	Permian N	Anderson Ranch to 34 Junction	I	Other	CPL	5/14/2012
34115	Colorado City	Snyder B1	IV	Idle Isolate Purge	CPL	5/1/2012
34142	Colorado City	Canon 503	II	Rehab or Replace Pipe	CPL	3/20/2012
34143	Colorado City	Standline Stk SA & Glo	III	Rehab or Replace Pipe	CPL	3/1/2012
34220	Permian N	A E Coe	III	Rehab or Replace Pipe	CPL	7/5/2012
34225	Permian N	Vacuum Tie In to Lea Stn	I	Other	CPL	5/15/2012
3464	Cushing	Tatum to H&M Corner	III	Rehab or Replace Pipe	CPL	4/24/2012
3537	Kilgore	Nettleton to Texoma	III	Conduct ILI	CPL	4/25/2012
3844	Casper	Sussex B2 to Sussex Stn	III	Rehab or Replace Pipe	CPL	6/7/2012
3937	Evanston	Russ Jct to LaBarge Station	III	Conduct ILI	CPL	6/14/2012
3957	Evanston	Carter Creek to Whitney to Divide Station	III	Conduct ILI	CPL	7/17/2012
4001	Permian N	State Warn A/C #1 (WTI)	III	Other	CPL	4/24/2012
4022	Bakersfield	Yowlumne to Metson (Line 310)	IV	Conduct ILI	CPL	3/14/2012

4027	Colorado City	Chevron Tract 74 - Good Sta (w/ TJ Good 38)	II	Conduct ILI	CPL	6/7/2012
4028	Colorado City	Chevron Tract 74 - Good Sta (w/ TJ Good 38)	II	Other	CPL	6/6/2012
4052	Belfield	RC 33-17	III	Idle Isolate Purge	CPL	6/21/2012
4080	Belfield	6-23 Miller	IV	Other	CPL	3/26/2012
4081	Belfield	Miller Tie-In to Rhame Sta 3"	III	Other	CPL	3/26/2012
41312	Permian E	Kelley	IV	Other	CPL	7/23/2012
41313	Permian E	Cross Timbers	IV	Other	CPL	7/23/2012
41314	Permian E	Holly	IV	Other	CPL	7/23/2012
4233	Russell	Koblitz Discharge	IV	Conduct ILI	CPL	4/21/2012
42735	Permian S	HSA283	IV	Idle Isolate Purge	CPL	5/1/2012
42736	Permian S	Estes 12 to 298 Sta	II	Rehab or Replace Pipe	CPL	6/8/2012
4382	Kilgore	Haynesville to Mid Valley Station 6"	III	Conduct ILI	CPL	8/23/2012
4384	Permian E	Iraan to Centurian 16"	IV	Idle Isolate Purge	CPL	3/22/2012
4394	Colorado City	China Grove to WTG 4" Sour	IV	Idle Isolate Purge	CPL	3/26/2012
4404	Wichita Falls	Basin Manifold to Enbridge Manifold 24"	III	Conduct ILI	CPL	3/2/2012
4406	Cushing Terminal	Plains to Enbridge North Delivery 24"	III	Conduct ILI	CPL	7/29/2012
44153	Russell	Mermis Lateral	IV	Idle Isolate Purge	CPL	5/15/2012
44157	Permian E	South 6" ML	IV	Idle Isolate Purge	CPL	6/14/2012
44158	Permian E	South 6" ML	IV	Idle Isolate Purge	CPL	7/25/2012
44159	Permian E	181A & 186A to 6" South	IV	Idle Isolate Purge	CPL	6/14/2012
44160	Permian E	181A & 186A to 6" South	IV	Idle Isolate Purge	CPL	7/17/2012
44161	Permian E	SDU Tract 112A - Cauble Pump	IV	Idle Isolate Purge	CPL	8/30/2012
44166	Permian N	Central Robertson	IV	Evaluate & Enhance ROW & Markers	CPL	6/11/2012
44167	Colorado City	Brennand 2"	II	Other	CPL	7/27/2012
44188	Kilgore	Haynesville Stg to Haynesville Stn 4"	III	Conduct ILI	CPL	3/6/2012
44210	Permian S	Wink North to Wink East All American PL 16"	IV	Idle Isolate Purge	CPL	7/6/2012
4422	Permian S	Wink East to Kinder Morgan 8"	III	Other	CPL	4/18/2012
44245	Abbeville	Black Elk Block 45	III	Conduct Hydro	CPL	3/31/2012
44246	Abbeville	Stone Energy	III	Conduct Hydro	CPL	3/31/2012
44247	Abbeville	Comingling (Targa)	III	Conduct Hydro	CPL	3/31/2012
44248	Abbeville	Johnson Bayou Gath ML	III	Conduct Hydro	CPL	3/31/2012
44249	Abbeville	Williams 6" to 10"	III	Conduct Hydro	CPL	3/31/2012
44250	Abbeville	Stingray 6" Lateral	III	Conduct Hydro	CPL	3/31/2012

44251	Abbeville	Sabine Pass Dock Line 10"	III	Conduct Hydro	CPL	8/15/2012
4430	Midland Basin	Mesa to Centurian 10"	III	Other	CPL	3/28/2012
45665	Permian E	SDU 51, 52, ect. Lateral	IV	Idle Isolate Purge	CPL	6/21/2012
45667	Permian E	Sulfur Draw to Ken Cox 6"	IV	Idle Isolate Purge	CPL	6/7/2012
4567	Permian E	Garden City 40	III	Idle Isolate Purge	CPL	3/28/2012
4589	Permian E	N Fee LACT to Main Pump	III	Evaluate & Enhance Cleaning Pig Program	CPL	6/29/2012
4590	Evanston	Shell (Taylor) Texaco Truck to ML	II	Conduct ILI	CPL	7/24/2012
4601	Permian E	Upton to Tippet ML (W/ Pembroke 65 & NPSU Battery leases)	IV	Conduct ILI	CPL	4/2/2012
4603	Permian E	Tippett - Tippett "Y"	IV	Conduct ILI	CPL	4/26/2012
4605	Permian E	Patterson to Tippet Y 6" ML	IV	Conduct ILI	CPL	4/24/2012
4607	Permian E	Tippett "Y" to Spraberry	IV	Conduct ILI	CPL	4/25/2012
4628	Permian N	Block 6 (Formerly = Wagner HR - Apache Tie In)	III	Conduct ILI	CPL	5/16/2012
4663	Belfield	BSMU 32-01 ML 6"	III	Conduct ILI	CPL	5/22/2012
4682	Belfield	Pederson #1 to Tveit #1	IV	Other	CPL	3/26/2012
4693	Belfield	Dynneson 12X-5	IV	Other	CPL	6/21/2012
4959	Permian E	Karen	IV	Evaluate & Enhance Inhibitors or Biocides	CPL	3/30/2012
4964	Permian E	Casey Lynn & Sloan	IV	Evaluate & Enhance Inhibitors or Biocides	CPL	3/30/2012
6228	Permian S	Caballos to ML (Route ID 11780)	IV	Evaluate & Enhance Inhibitors or Biocides	CPL	3/30/2012
6229	Permian S	Davidson 42	IV	Other	CPL	6/7/2012
6374	Colorado City	Kirkpatrick Skelly Sta	III	Other	CPL	3/1/2012
7031	Permian E	Cauble Discharge w/ Laterals (Cauble Gathering)	III	Other	CPL	5/24/2012

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ATTACHMENT B

RSP Screening Summary for Acquired Pipelines

**Pipelines Due for RSP Screening March 1, 2012 through
August 31, 2012**

Caballos to ML (Route ID 11780)**Information**

Pipeline Segment Name	Caballos to ML (Route ID 11780)		
RSP Risk Screening Log	103-Pitchfork Gath & Thomas ML	Risk Level	IV
Pipeline Segment ID	06.01	Risk Color	■
Risk Screening Record No	103.06.01	Risk Level Date	11/10/2011
District	Permian S	Review Date	11/10/2011
Division	SW	Next Review Date	11/10/2016
Region	Western Region	Owner	P/L Integrity

Materials

Yr Built	9/8/2011	Override Nom WT	✓
Length (ft)	4,431	Nom WT (in)*	0.237
Length (mi)	0.84	Multiple Diameters	N
Material	Steel	Multiple Diameter Info	
Grade	X52	Material Description	
Nom OD (in)	4.500	Seam Description	
Seam	ERW	Girth Joint Description	
Girth Joint	ARC		

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Legg Federal 6" (Route ID 12920)**Information**

Pipeline Segment Name	Legg Federal 6" (Route ID 12920)		
RSP Risk Screening Log	54-Poker Lake Gathering	Risk Level	IV
Pipeline Segment ID	18	Risk Color	■
Risk Screening Record No	54.18	Risk Level Date	3/23/2012
District	Permian S	Review Date	7/12/2012
Division	SW	Next Review Date	7/12/2017
Region	Western Region	Owner	P/L Integrity

Materials

Yr Built	2/1/2012	Override Nom WT	✓
Length (ft)	14,603	Nom WT (in)*	0.277
Length (mi)	2.77	Multiple Diameters	N
Material	Steel	Multiple Diameter Info	
Grade	X42	Material Description	
Nom OD (in)	6.625	Seam Description	
Seam	ERW	Girth Joint Description	
Girth Joint	ARC		

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127-South Texas Gathering

Information

RSP Risk Screening Log Name	127-South Texas Gathering	Owner	P/L Integrity
Risk Screening Log ID	127	Meeting Date	
Region	Eastern Region	Division	SO
District	Corpus Christi		

Risk Screening Meeting Log

Pipeline System	Pipeline Subsystem
State	County/Parrish
Meeting Location	

System Information

Created By	Richard Bayle, 4/26/2012 3:33 PM	Last Modified By	Richard Bayle, 4/26/2012 3:33 PM
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RSP Pipeline Segments

Light Ranch 4" (Route ID12851)

Pipeline Segment ID 01
Review Date 5/9/2012

Vivion 4" (NR Segment, Route ID 12852)

Pipeline Segment ID 02
Review Date 5/9/2012

Lassester & Eppright 4" (Route ID 12854)

Pipeline Segment ID 03
Review Date 5/9/2012

Brisco Ranch 4" (Route ID 12864)

Pipeline Segment ID 04
Review Date 5/9/2012

Brisco Ranch 6" (Route ID 12863)

Pipeline Segment ID 05
Review Date 5/9/2012

Brisco Ranch 1A 8" (Route ID 12855)

Pipeline Segment ID 06

Review Date 5/9/2012

CDP 3 4" (Route ID 12868)

Pipeline Segment ID 07

Review Date 5/9/2012

CDP 2 to CDP5 Tie In (Route ID 12865 & 12870)

Pipeline Segment ID 08

Review Date 5/9/2012

CDP 4 (Route ID 12871)

Pipeline Segment ID 09

Review Date 5/9/2012

CDP 1 (Route ID 12872)

Pipeline Segment ID 10

Review Date 5/9/2012

CDP 4" to 6" Crossover (Route ID 12871)

Pipeline Segment ID 11

Review Date 5/9/2012

CDP 5 to Catarina Terminal 8" (Route ID 12853)

Pipeline Segment ID 12

Review Date 5/9/2012

Boldt 6" (Route ID 12857)

Pipeline Segment ID 13

Review Date 5/9/2012

Boldt to Catarina 8" (Route ID 12856)

Pipeline Segment ID 14

Review Date 5/9/2012

CDP 6 (Route ID 12867)

Pipeline Segment ID 15

Review Date 5/10/2012

CDP 8 4" (Route ID 12873)

Pipeline Segment ID 16

Review Date 5/10/2012

RSP Risk Screening Log History

4/26/2012 3:33 PM

User Richard Bayle

Action Created.

RSP Action Plans

Light Ranch 4" - 2013/5/9

Vivion 4" (NR Segment) - 2013/5/9

Lassester & Eppright 4" - 2012/8/7

Brisco Ranch 4" - 2013/5/9

Brisco Ranch 6" - 2012/8/7

Brisco Ranch 1A 8" - 2013/5/9

CDP 2 to CDP5 Tie In - 2013/5/8

CDP 3 4" - 2013/5/8

CDP 4 - 2013/5/8

CDP 1 - 2013/5/8

CDP 4" to 6" Crossover - 2013/5/8

CDP 5 to Catarina Terminal 8" - 2013/5/8

Boldt 6" - 2013/5/8

Boldt to Catarina 8" - 2013/5/8

CDP 6 - 2013/5/10

CDP 8 4" - 2013/5/10

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ATTACHMENT C

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status

ATTACHMENT C-1

**Leak Detection and Slack Line Operations
Investigation and Action Plan Development and
Implementation Status
Appendix B Pipeline Segments**

ATTACHMENT C-1

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2012 through August 31, 2012

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION				ACTION PLANS			
					DATE COMPLETED	FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	DATE DEVELOPED	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²	DATE COMPLETED
1	RP_STSRP_DPTRP	Stroud to Dupont Terminal 10" Bypass - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	5/3/2010	0	0	10-15	5/3/2010	DTAs Configured	Complete	5/3/2010
2	EP_ELPEP_ABQEP	El Paso to Albuquerque - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2010	0	100-700	30-60	8/5/2010	2 CVs installed, DTAs configured, LPC added	Complete	4/26/2011
3	BS_WFL_CSH	Basin Wichita Falls to Cushing - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	10/7/2010	0-640	0-3230	10-20	10/7/2010	CV installed, DTAs configured, RTTM Installed	Complete	7/18/2011
4	BS_COL_WFL	Basin Colorado City to Wichita Falls - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	10/7/2010	0	3,000-7,500	10-50	10/7/2010	DTAs configured, Meter installed, RTTM Installed	Complete	7/18/2011
5	LN2000/63	Line 2000/63 SSP	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	8/2/2010	0	550	60	8/2/2010	DTAs Configured	Complete	8/2/2010
6	RP_STSRP_RCTRP	Stroud to Rapid City Terminal 6" - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2010	0	10-50	15-60	7/1/2010	DTAs Configured	Complete	7/1/2010
7	RP_STSRP_CHTRP	Stroud to Cheyenne Terminal 8" - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	7/21/2010	0	10-30	10-15	7/21/2010	DTAs Configured	Complete	7/21/2010
8	TL_MED_OKI	Tulsa - Medford to Oki Junction - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/7/2010	0	0	30-90	9/7/2010	DTAs Configured	Complete	9/7/2010
9	RP_NCSRP_RCTRP	New Castle to Rapid City Terminal 6" - O/S (inc WRC 8")	OASyS 7 DNA PLM	API RP 1130 Compliant	10/1/2010	0	0-30	0-15	10/1/2010	DTAs Configured	Complete	10/1/2010
10	RR_YTS_HLD	Yantis to Healdton	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2010	0	200-300	60-90	7/1/2010	Δ Ops Procedure, DTAs Configured	Complete	10/1/2010
11	RR_HLD_RCS	Healdton to Cushing	OASyS 7 DNA PLM	API RP 1130 Compliant	10/26/2010	0	0	30	12/5/2011	Δ Ops Procedure, DTAs Configured, RTU installed	Complete	4/30/2012
12	BOAC	Bay Marchand/Ostrica to Alliance - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	0	0	30	9/1/2010	DTAs Configured	Complete	9/1/2010
13	SCS_BRM	Bumpas Coffeyville to Broom	OASyS 7 DNA PLM	API RP 1130 Compliant	8/16/2010	0	170	30	8/16/2010	DTAs Configured	Complete	8/16/2010
14	RP_CHTRP_DPTRP	Cheyenne South to Dupont - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/23/2010	0	0	10-15	9/23/2010	DTAs Configured	Complete	9/23/2010
15	BS_BJL_BML	Basin Jal to Basin Midland - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	10/7/2010	0	2750	20	3/30/2011	Meter & CV installed, DTAs configured, RTTM Installed	Complete	5/23/2012
16	BS_BML_COL	Basin Midland to Colorado City - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	9/23/2010	0	3800-4000	30-45	3/30/2011	2 Meters installed, DTAs configured, RTTM Installed	Complete	7/18/2012
17	RP_CMSRP_FOTRP	Commerce City to Fountain - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2010	50-75	150-200	30-60	7/1/2010	Δ Ops Procedure, DTAs Configured	Complete	9/30/2010
18	PB_WSN_WOD	Wasson to West Odessa - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/15/2010	0	600	25	9/15/2010	DTAs Configured	Complete	10/28/2010
19	BF_SKH_BLN	Stockholm to Blaine O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2010	665	665-950	60-90	12/5/2011	DTAs Configured	In Progress	
20	MG_TEN_LUM	Ten Mile to Lumberton 14"	OASyS 7 DNA PLM	API RP 1130 Compliant	6/1/2010	0	75	25	7/2/2010	DTAs Configured	Complete	7/2/2010
21	MG_LUM_EUT_L2	Eucutta to Lumberton Line 2	OASyS 7 DNA PLM	API RP 1130 Compliant	6/1/2010	150	150-200	30	4/14/2011	Δ Ops Procedure, DTAs Configured, CV Installed	Complete	6/21/2012
22	CW_PKE_WRV	Capwood - Patoka East to Wood River - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	8/16/2010	0	370	30	8/16/2010	DTAs Configured	Complete	8/16/2010
23	MG_LUM_EUT_L3	Lumberton to Eucutta line 3	OASyS 7 DNA PLM	API RP 1130 Compliant	9/27/2010	50	75	25-30	4/14/2011	RTU installed, DTAs Configured	Complete	1/16/2012
24	BF_HAR_SKH	Harpers Ranch to Stockholm - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	8/16/2010	150	175-200	60-90	6/9/2011	Meter & RTU ordered, DTAs Configured	In Progress	
25	CS_ORN_CAL	Orion to Calumet	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	120	600	120	6/9/2011	BV, CV, & RTU installed, DTAs Configured	Complete	12/8/2011
26	CAM1	Clovelly to Alliance / Murphy - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	0	0	15	9/1/2010	None Required	Complete	9/1/2010
27	CA_PNTCA_EMDC	Pentland to Emidio - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	0	200	10	9/1/2010	DTAs Configured	Complete	9/1/2010
28	CS_CAS_CCJ	CASHION CASHION - CIMARRON - CUSHING O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/9/2010	0	600-900	30-40	12/5/2011	CV installed, DTAs Configured	Complete	4/18/2012
29	CS_BLN_CAS	Blaine to Cashion - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	0	800	45	12/5/2011	CV and RTU installed, DTAs Configured	Complete	4/2/2012
30	CH_OKY_CUS	Oklahoma to Cushing	OASyS 7 DNA PLM	API RP 1130 Compliant	10/20/2010	0	775	80	6/9/2011	CV installed, Δ Ops Procedure, DTAs Configured	Complete	3/20/2012
31	CA_LSFCA_PNTCA	Las Flores to Pentland - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2010	430	550	20	9/1/2010	Δ Ops Procedure, DTAs Configured	Complete	10/28/2010
32	KE_GOR_BUS	Gorham to Schurr	OASyS 7 DNA PLM	API RP 1130 Compliant	11/10/2010	0-400	400	60-90	6/9/2011	CV & 3 Meters ordered, DTAs Configured	In Progress	

ATTACHMENT C-1

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2012 through August 31, 2012

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION				ACTION PLANS			
					DATE COMPLETED	FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	DATE DEVELOPED	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²	DATE COMPLETED
33	CS_ELK_COY	Elk City to Colony	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	0	100-300	5-10	11/1/2010	None Required	Complete	11/1/2010
34	SP_SDWSP_KCXSP	Sulfur Draw to Ken Cox - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/12/2010	0	0	5-10	10/12/2010	None Required	Complete	10/12/2010
35	CS_VER_CAL	Verdon to Calumet	OASyS 7 DNA PLM	API RP 1130 Compliant	9/23/2010	0	70	30-60	12/5/2011	DTAs Configured	In Progress	
36	GM_GMD_HMA	Golden Meadow to Liretta	OASyS 7 DNA PLM	API RP 1130 Compliant	8/31/2010	0	0	10-20	8/31/2010	DTAs Configured	Complete	8/31/2010
37	SHI_PLM1	Sandhills to Crane	OASyS 7 DNA PLM	API RP 1130 Compliant	11/10/2010	500	500	150	4/13/2011	Meter installed, CV & RTU ordered, DTAs Configured	In Progress	
38	C_PLM08	Delek to Tyler	OASyS 7 DNA PLM	API RP 1130 Compliant	6/1/2010	10	100	40	9/1/2011	MOV installed, DTAs Configured	Complete	12/16/2011
39	ND_RHM_MRM	Rhame to Marmarth	OASyS 7 DNA PLM	API RP 1130 Compliant	12/1/2010	550	550	60	6/14/2011	CV ordered	In Progress	
40	AT_TRU_SHG	Trunkline to Shell Gibson	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	0	0	5	11/1/2010	DTAs Configured	Complete	11/1/2010
41	FD_RBU_CBK	Ross Bayou to Canebroke	OASyS 7 DNA PLM	API RP 1130 Compliant	10/15/2010	0	0	0	10/15/2010	DTAs Configured	Complete	10/15/2010
42	SP_CSRSP_DRVSP	Coates to Driver - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	8/25/2010	0	0	0	8/25/2010	DTAs Configured	Complete	8/25/2010
43	KW_TRN_HRN	Trenton - Herndon O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/17/2010	320	450	240	6/9/2011	CV & Meter installed, DTAs Configured	Complete	8/20/2012
44	ND_MRM_BAK	Marmarth to Baker	OASyS 7 DNA PLM	API RP 1130 Compliant	11/24/2010	700-1000	700-1000	30-45	4/18/2011	CV ordered, DTAs Configured	In Progress	
45	KE_NES_HOG	Ness City - Riverside - Hodgeman O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/21/2010	0	75-250	60-120	6/9/2011	CV & Meter ordered, DTAs Configured	In Progress	
46	RR_HWK_QMN	Hawkins to Quitman	OASyS 7 DNA PLM	API RP 1130 Compliant	10/28/2010	0	20-40	10-15	10/28/2010	DTAs Configured	Complete	10/28/2010
47	BF_KAU_ORN	Kaufman to Orion - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/10/2010	0	0	0	11/10/2010	None Required	Complete	11/10/2010
48	MG_CHU_TEN	Churchula to Ten Mile	OASyS 7 DNA PLM	API RP 1130 Compliant	11/19/2010	0	150-200	15-20	11/19/2010	DTAs Configured	Complete	11/19/2010
49	GM_CAI_COC	Cailou Island to Cocodrie	OASyS 7 DNA PLM	API RP 1130 Compliant	9/28/2010	0	0	0	9/28/2010	None Required	Complete	9/28/2010
50	SP_TIPSP_SPBSP	Tippett to Patterson - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	12/2/2010	0	0	10	12/2/2010	None Required	Complete	12/2/2010
51	C_PLM23_CRSA	Crain Ranch to Sabine	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	0	0	0	11/1/2010	None Required	Complete	11/1/2010
52	MG_EUT_YCK	Eucutta to Yellow Creek	OASyS 7 DNA PLM	API RP 1130 Compliant	7/6/2010	0	120-160	10-20	7/6/2010	DTAs Configured	Complete	7/6/2010
53	SP_WESNJ_CGVRW	Westbrook to China Grove - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/26/2010	0	10-30	10	10/26/2010	None Required	Complete	10/26/2010
54	AR_HAY BUM	Arklatex	OASyS 7 DNA PLM	API RP 1130 Compliant	10/26/2010	0	100-300	30	9/1/2011	Δ Ops Procedure, DTAs Configured	In Progress	
55	SP_FLD_MIDSP	Floyd to Midland - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/28/2010	0	5-20	3-5	10/28/2010	None Required	Complete	10/28/2010
56	CA_BELCA_LIGHT	Belridge Light Incoming - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	0	0	0	11/1/2010	None Required	Complete	11/1/2010
57	AT_BDK_PAP	Burns Dock to Patterson	OASyS 7 DNA PLM	API RP 1130 Compliant	11/16/2010	0	20-40	5-10	11/16/2010	DTAs Configured	Complete	11/16/2010
58	MG_TEN_MOS	Ten Mile to Mobil Ship 14"	OASyS 7 DNA PLM	API RP 1130 Compliant	11/18/2010	450	450	15-45	4/14/2011	DTAs Configured	In Progress	
59	PG_10GPG_LAKPG*	EKV/LAK/COL via L65	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	370	370	60	3/23/2011	CV installed	Complete	1/18/2012
	PG_10GPG_LAKPG	EKV/LAK/COL via L50	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	170	170	20	3/23/2011	CV installed	Complete	11/1/2011
60	RR_QMN_YTS	Quitman to Yantis	OASyS 7 DNA PLM	API RP 1130 Compliant	10/1/2010	0	0	0	10/1/2010	DTAs Configured	Complete	10/1/2010
61	SP_GLCSP_MIDSP	Glasscock to Midland - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/1/2010	0	0-30	10-20	10/1/2010	DTAs Configured	Complete	10/1/2010
62	SP_OWNSP_BLLSP	Owens to Ball - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/15/2010	115	150-200	30-60	4/13/2011	RTU installed, DTAs Configured	In Progress	
63	NM_DLH_JAL	Dollarhide to Jal	OASyS 7 DNA PLM	API RP 1130 Compliant	10/11/2010	0	225-300	60	4/19/2011	Δ Ops Procedure, DTAs Configured	Complete	6/1/2011
64	C_PLM12_PWFL	Powell to Floyd - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/28/2010	0	50-150	10-20	10/28/2010	DTAs Configured	Complete	10/28/2010
65	SP_GRWSP_MIDSP	Greenwood to Midland - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/9/2010	0	10-20	5	11/9/2010	None Required	Complete	11/9/2010
66	CH_HWT_TSY	Cherokee Hewitt to Tussy	OASyS 7 DNA PLM	API RP 1130 Compliant	10/20/2010	0	775	80	10/20/2010	Remove from service	Complete	10/24/2010
67	EL_BUR_DCK	Burns Terminal to Burns Dock	OASyS 7 DNA PLM	API RP 1130 Compliant	11/8/2010	0	0	0	11/8/2010	None Required	Complete	11/8/2010
68	CA_ALHCA_BELCA	Aera Lost Hills to Belridge - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	12/1/2010	0	0	0	12/1/2010	None Required	Complete	12/1/2010

ATTACHMENT C-1

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2012 through August 31, 2012

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION				ACTION PLANS			
					DATE COMPLETED	FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	DATE DEVELOPED	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²	DATE COMPLETED
69	CH_TSY_OKY	Tussy to Oklahoma City	OASyS 7 DNA PLM	API RP 1130 Compliant	10/20/2010	0	775	80	6/9/2011	CV installed, Δ Ops Procedure, DTAs Configured	Complete	3/20/2012
70	AT_COA_PAP	Coastal to Patterson Pump	OASyS 7 DNA PLM	API RP 1130 Compliant	10/14/2010	0	0	5	10/14/2010	None Required	Complete	10/14/2010
71	SP_HNYSP_CSRSP	Hanley to Coates Ranch	OASyS 7 DNA PLM	API RP 1130 Compliant	10/6/2010	0	0	0	10/6/2010	None Required	Complete	10/6/2010
72	RP_DPTRP_CMSRP_SOUTH	Dupont - Commerce City South - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	12/1/2010	0	0	0	12/1/2010	None Required	Complete	12/1/2010
73	RP_CMSRP_DPTRP	Commerce City to Dupont North - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/29/2010	0	0	0	11/29/2010	None Required	Complete	11/29/2010
74	BS_CFL_CNC	Basin Conoco Falls to Conoco - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/1/2010	0	0	5	10/1/2010	None Required	Complete	10/1/2010
75	JP_ELPJP_JUAJP	El Paso to Juarez - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/27/2010	0	10-20	5	9/27/2010	DTAs Configured	Complete	9/27/2010
76	CFD_PLM4	Cranfield Truck to Cranfield	OASyS 7 DNA PLM	API RP 1130 Compliant	10/5/2010	0	20-30	5-10	10/5/2010	None Required	Complete	10/5/2010
77	PG_LAKPG_KEYPG	Lake to Kelly 10" Line 1 - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	10/1/2010	0	0	5	10/1/2010	None Required	Complete	10/1/2010
78	ST_GWS_VLO	George West to Valero	OASyS 7 DNA PLM	API RP 1130 Compliant	10/11/2010	0	0	3	10/11/2010	None Required	Complete	10/11/2010
79	PG_EDACA_LAKPG	Derby to Lake 8" Line 2 - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	11/1/2010	300	300	60	10/28/2011	CV Ordered, DTAs Configured	In Progress	
80	BRGLK_BUR	Bridger Lake Station 8 to Burns Terminal - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	9/27/2010	0	0	5	9/27/2010	None Required	Complete	9/27/2010

*PG_10GPG_LAKPG was divided into 2 separate PLMs -- PG_18EPG_L65PG and PG_10GPG_L50PG -- in order to improve the fidelity of the leak detection on that segment.

¹ Action Taken To Date

In Development: Measure(s) to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection systems is being determined.

None Required: No action required. Current CPM leak detection tolerances are adequate or Slack-Line Operations are not present.

Δ Ops Procedure: Operating procedures for the applicable Segments of Pipeline including the "start-up" and "shut-in" procedures have been revised.

BV, CV, MOV ordered/installed: Block valves (BV), Motor operated valves (MOV), or pressure control devices (CV) have been installed.

DTAs Configured: CPM alarm limits have been adjusted to account for the expected refilling of the slack volumes.

LPC Added: Line-pack correction has been added to the CPM to compensate for changes in pipeline inventory.

Meter ordered/installed: Meter has been installed to improve the line balance between the originating and terminating stations.

Remove from service: All or a portion of the pipeline has been removed from the CPM segment.

RTTM Installed: Real time transient model has been configured to provide enhanced leak detection on the pipeline segment.

RTU ordered/installed: Remote Terminal Unit has been installed at a field site in order to transmit recorded pressure and/or flow and/or temperature measurements back to SCADA.

² Action Plan Status

In Development: Action Plan is being developed. Measure(s) to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection systems is being determined; some measures may be implemented prior to an action plan being developed.

In Progress: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system is being implemented.

Complete: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system have been implemented.

ATTACHMENT C-2

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status Additional 30 Pipeline Segments

ATTACHMENT C-2

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2012 through August 31, 2012

	CONSENT DECREE ADDITIONAL 30 SEGMENTS OF PIPELINE PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION				ACTION PLANS			
					DATE COMPLETED	FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	DATE DEVELOPED	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²	DATE COMPLETED
1	AK_HSSAK_CCVAK	Haynesville Storage to Calumet/Cotton Valley	OASyS 7 DNA PLM	API RP 1130 Compliant	6/20/2011	0	60-90	30	9/1/2011	Δ Ops Procedure, DTAs Configured	Complete	2/6/2012
2	AT_S62AT_SHGAT	Station 62 to Shell Gibson	OASyS 7 DNA PLM	API RP 1130 Compliant	8/1/2011	0	0	0	8/1/2011	None Required	Complete	8/1/2011
3	BC_VNCBC_CHV	Venice to Chevron	OASyS 7 DNA PLM	API RP 1130 Compliant	5/2/2011	0	0	0	5/2/2011	DTAs Configured	Complete	5/2/2011
4	CA_BELCA_PGSCA	Belridge to Pentland	OASyS 7 DNA PLM	API RP 1130 Compliant	5/16/2011	300	1800	120	5/19/2011	CV installed, RTU ordered	In Progress	
5	CH_HWTCH_NUSCH	Hewitt to NuStar	OASyS 7 DNA PLM	API RP 1130 Compliant	10/14/2010	0	0	0	10/14/2010	None Required	Complete	10/14/2010
6	CW_PTT_PTK	Patoka Truck to Patoka Station	OASyS 7 DNA PLM	API RP 1130 Compliant	7/27/2011	0	0	0	7/27/2011	None Required	Complete	7/27/2011
7	DK_FBGD_DDGDK	Fryburg to Dodge	OASyS 7 DNA PLM	API RP 1130 Compliant	12/21/2010	300	300-400	120	12/21/2010	CV installed, DTAs Configured	Complete	4/2/2012
8	FR_CBKFR_CDFR	Canebrake to Cranfield	OASyS 7 DNA PLM	API RP 1130 Compliant	6/16/2011	0	150	20	6/16/2011	Δ Ops Procedure, DTAs Configured, RTU installed	Complete	4/27/2012
9	FR_DLDFR_CBKFR	Delhi Denbury to Canebrake	OASyS 7 DNA PLM	API RP 1130 Compliant	5/2/2011	0	25	10-15	5/2/2011	DTAs Configured	Complete	5/2/2011
10	HB_TOMHB_JALNM	Thomas to Jal	OASyS 7 DNA PLM	API RP 1130 Compliant	5/3/2010	0	300-700	300-420	5/6/2010	Δ Ops Procedure, DTAs Configured	Complete	6/2/2010
11	L2_LAP63_WHY63	LA Pump to West Hynes	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	5/3/2010	0	150-400	30	5/6/2010	CV Installed, DTAs Configured, Meter Installed	Complete	9/3/2010
12	MG_BAYMG_HLBMG	Bay Springs to Heidelberg	OASyS 7 DNA PLM	API RP 1130 Compliant	8/1/2011	0	0	10	8/1/2011	RTU Installed	Complete	8/1/2011
13	RL_ROBRL_STYRL	Robinson Lake to Stanley	OASyS 7 DNA PLM, ATMOS Pipe	API RP 1130 Compliant	4/25/2011	0	0	0	4/25/2011	DTAs Configured	Complete	4/25/2011
14	RN_CASRN_FLMRN	Casper to Guernsey/Ft Laramie	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2011	0	120	20	7/1/2011	DTAs Configured	Complete	7/1/2011
15	RN_EDGRN_SCKRN	Edgerton to Salt Creek	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2011	0	120	18	7/1/2011	DTAs Configured, RTU Installed	Complete	7/21/2011
16	RN_FLMRN_CHERN	Ft Laramie to Cheyenne	OASyS 7 DNA PLM	API RP 1130 Compliant	12/15/2010	0	300-500	30-40	1/6/2011	CV installed, DTAs Configured	Complete	12/15/2011
17	RN_GRYRN_FLMRN_24	Guernsey to Ft Laramie 24"	OASyS 7 DNA PLM	API RP 1130 Compliant	1/6/2011	100-2000	1500-2100	60-90	1/6/2011	CV installed, DTAs Configured	In Progress	
18	RN_HAMRN_KBSRN	Hamilton Dome to Kirby	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2011	0	0	55	7/1/2011	DTAs Configured	Complete	7/1/2011
19	RN_RENRN_SCKRN	Reno to Salt Creek	OASyS 7 DNA PLM	API RP 1130 Compliant	6/28/2011	80	80	15	6/28/2011	Δ Ops Procedure, DTAs Configured, RTU Installed, Meter ordered	In Progress	
20	RN_SCKRN_CASRN	Salt Creek to Casper	OASyS 7 DNA PLM	API RP 1130 Compliant	7/25/2011	0	1200	270	7/25/2011	CV installed, DTAs Configured	Complete	1/3/2012
21	RS_GRGRS_WAHRs	Granger to Wahsatch	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2011	200	600	45	7/1/2011	CV installed, DTAs Configured	Complete	5/6/2012
22	RS_ILSRs_WAMRS	Iles to Wamsutter	OASyS 7 DNA PLM	API RP 1130 Compliant	2/7/2011	0	0	30-40	2/7/2011	DTAs Configured	Complete	2/7/2011
23	RS_LBPRs_GRRs	LaBarge to Granger	OASyS 7 DNA PLM	API RP 1130 Compliant	12/20/2010	600	875	150	12/20/2010	CV installed, DTAs Configured	Complete	2/10/2011
24	RS_WAMRS_GRGRs	Wamsutter to Granger	OASyS 7 DNA PLM	API RP 1130 Compliant	5/3/2011	0	500	120	5/3/2011	Δ Ops Procedure, DTAs Configured	Complete	7/22/2011
25	SL_BESL_COCSL	Bay St Elaine to Cocodrie	OASyS 7 DNA PLM	API RP 1130 Compliant	9/1/2011	0	0	0	9/1/2011	None Required	Complete	9/1/2011
26	SP_DRVSP_MCTIR	Driver to McCamey	OASyS 7 DNA PLM	API RP 1130 Compliant	6/15/2011	0	50-150	25-60	6/28/2011	CV Ordered, DTAs Configured	In Progress	
27	WT_GOLWT_MIDWT	Goldsmith to Midland #1 10"	OASyS 7 DNA PLM	API RP 1130 Compliant	8/1/2011	0	200-500	40	8/1/2011	CV Ordered, DTAs Configured	In Progress	
28	WT_GOLWT_MIDWT_PMT	Goldsmith to Midland #2 8"	OASyS 7 DNA PLM	API RP 1130 Compliant	4/1/2011	0	100-200	15-30	4/1/2011	CV Installed, DTAs Configured	Complete	5/24/2011
29	WT_MCTIR_MIDIR	McCamey to Midland	OASyS 7 DNA PLM	API RP 1130 Compliant	7/1/2011	0	200	20	7/1/2011	DTAs Configured	Complete	7/1/2011
30	WT_MIDMP_CCYMP	Midland Mesa to Colorado City	OASyS 7 DNA PLM	API RP 1130 Compliant	4/4/2011	5000	7000	120	7/5/2011	2 CVs Installed, DTAs Configured	In Progress	

ATTACHMENT C-2

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2012 through August 31, 2012

¹ Action Taken To Date

In Development: Measure(s) to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection systems is being determined.

None Required: No action required. Current CPM leak detection tolerances are adequate or Slack-Line Operations are not present.

Δ Ops Procedure: Operating procedures for the applicable Segments of Pipeline including the "start-up" and "shut-in" procedures have been revised.

BV, CV, MOV ordered/installed: Block valves (BV), Motor operated valves (MOV), or pressure control devices (CV) have been installed.

DTAs Configured: CPM alarm limits have been adjusted to account for the expected refilling of the slack volumes.

LPC Added: Line-pack correction has been added to the CPM to compensate for changes in pipeline inventory.

Meter ordered/installed: Meter has been installed to improve the line balance between the originating and terminating stations.

Remove from service: All or a portion of the pipeline has been removed from the CPM segment.

RTTM Installed: Real time transient model has been configured to provide enhanced leak detection on the pipeline segment.

RTU ordered/installed: Remote Terminal Unit has been installed at a field site in order to transmit recorded pressure and/or flow and/or temperature measurements back to SCADA.

² Action Plan Status

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In Progress: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system is being implemented.

Complete: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system have been implemented.

ATTACHMENT D

**Revised Tables Summarizing Expenditures
Associated with Consent Decree Section V.15.F.
(Anode Beds, Internal Corrosion Control and Close Interval
Surveys)**

ATTACHMENT E (Revised¹)

Summary of Expenditures Associated with Consent Decree Sectionn V.15.F.

	Number Installed/Replaced 2010 ²	Number Installed/Replaced Jan 1 - Aug 16, 2011 ³	Cummulative Number Installed/Replaced to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Anode Bed/ Rectifier Installation	78	32	110	120	\$2,064,265	\$976,911	\$3,041,176

	Number Installed 2010 ²	Number Installed Jan 1 - Aug 16, 2011 ³	Cummulative Number Installed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Corrosion Inhibitor/ Biocide Injection	76	29	105	None	\$35,329	\$183,206	\$218,535

	Miles Completed 2010 ²	Miles Completed Jan 1 - Aug 16, 2011 ³	Miles Completed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to August 16, 2011
Close Interval Surveys	1921	483	2404	2400	\$1,436,825	\$529,168	\$1,965,993

1 - This a revised version of Attachment E provided in the Semi-Annual Compliance Status report dated September 20, 2011.

¹ - As of December 20, 2010 Monthly Report

² - As of August 16, 2011 Monthly Report

Total Cummulative Expenditures on All V.F. Items (through February 28, 2011)	\$5,225,704
Consent Decree Goal	\$6,000,000
% of Goal	87.10%

ATTACHMENT E (Revised¹)

Summary of Expenditures Associated with Consent Decree Sectionn V.15.F.

	Number Installed/Replaced 2010 ²	Number Installed/Replaced Jan 1 - Feb 28, 2011 ³	Cummulative Number Installed/Replaced to Date (Feb 28, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Feb 28th)	Total Expenditures 2010 to Feb 28, 2011
Anode Bed/ Rectifier Installation	78	0	78	120	\$2,064,265	\$0	\$2,064,265

	Number Installed 2010 ²	Number Installed Jan 1 - Feb 28, 2011 ³	Cummulative Number Installed to Date (Feb 28, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Feb 28th)	Total Expenditures 2010 to Feb 28, 2011
Corrosion Inhibitor/ Biocide Injection	76	0	76	None	\$35,329	\$0	\$35,329

	Miles Completed 2010 ²	Miles Completed Jan 1 - Feb 28, 2011 ³	Miles Completed to Date (Feb 28, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Feb 28th)	Total Expenditures 2010 to February 28, 2011
Close Interval Surveys	1921	0	1921	2400	\$1,436,825	\$0	\$1,436,825

¹ - This a revised version of Attachment E provided in the Semi-Annual Compliance Status report dated March 20, 2011.

² - As of December 20, 2010 Monthly Report

³ - As of February 28, 2011 Monthly Report

Total Cummulative Expenditures on All V.F. Items (through February 28, 2011)	\$3,536,419
Consent Decree Goal	\$6,000,000
% of Goal	58.94%

ATTACHMENT E

Summary of Expenditures Associated with Consent Decree Sectionn V.15.F.

	Number Installed/Replaced 2010 ¹	Number Installed/Replaced Jan 1 - Aug 16, 2011 ²	Cummulative Number Installed/Replaced to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Anode Bed/ Rectifier Installation	78	82	160	120	\$2,064,265	\$2,561,141	\$4,625,406

	Number Installed 2010 ¹	Number Installed Jan 1 - Aug 16, 2011 ²	Cummulative Number Installed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Corrosion Inhibitor/ Biocide Injection	76	29	105	None	\$35,329	\$183,206	\$218,535

	Miles Completed 2010 ¹	Miles Completed Jan 1 - Aug 16, 2011 ²	Miles Completed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to August 16, 2011
Close Interval Surveys	1921	483	2404	2400	\$1,436,825	\$529,168	\$1,965,993

¹ - As of December 20, 2010 Monthly Report

² - As of December 31, 2011 Monthly Report

Total Cummulative Expenditures on All V.F. Items (through February 28, 2011)	\$6,809,934
Consent Decree Goal	\$6,000,000
% of Goal	113.50%